

# EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

HESHAM ISMAIL,

Plaintiffs,

v.

IHI POWER SERVICES  
CORP., MICHAEL  
PETTICORD, and KYLE  
ADLER,

Defendants.

Civil Action No. 2:20-  
CV-04801

AFFIDAVIT OF KATHLEEN REDPATH-  
PEREZ, ESQUIRE

"EXHIBIT C"

KATHLEEN REDPATH-PEREZ, of full age, certifies as follows:

1. I am an attorney of law of the State of New Jersey and I am an associate employed by the Law Offices of Eric A. Shore, PC and co-counsel for Plaintiff in this matter. I am making this Certification in support of the application of Plaintiff for an award of counsel fees and costs against Defendants.

2. Our total application for the Law Offices of Eric A. Shore for costs and fees is \$26,571.50 (Exhibit A) broken down as follows: (1) 12.60 of the time of Eric A. Shore, Esq. at the hourly rate of \$650.00; (2) 238.42 hours of the time of Kathleen Redpath-Perez, Esq, at the hourly rate of \$500; (3) 197.90 hours of the time of Briana Pearson, Esq. at the hourly rate of \$380.00; (4) 67.10 hours of the time of Brian Doyle, Esq. at the hourly rate of \$400.00; (5) 35.20 hours of the time of Scott Johnson at the hourly rate of \$500.00 and (4) costs of \$5,222.39 which includes 121.60 hours for paralegal/support staff work and the rest for other costs

including filing fees, copying, and other costs which are itemized in Exhibit B. The itemization of the costs and fees accrued by the attorneys, paralegals and support staff is set forth in Exhibit A, being filed herewith.

3. I make this certification based on my personal knowledge and review of the file as well as the credentials of the other attorneys who performed work herein. Briana Pearson, Esq.'s qualifications and experience can be found separately in her own certification in Exhibit F which also includes two certifications of her clients.

**Credentials of Eric A. Shore, Esq.**

4. Regarding Eric A. Shore, Mr. Shore Eric A. Shore, Esq. received his Bachelor of Arts Degree in Philosophy in 1991 from Emory University, and received his Juris Doctorate from the University of Pennsylvania Law School in 1994. Mr. Shore has been a member in good standing of the New Jersey bar since 1994. He is also currently admitted to the Pennsylvania bar (1994) and to the U.S. District Court District of New Jersey and U.S. District Court Eastern District of Pennsylvania.

5. Mr. Shore founded the Law Offices of Eric A. Shore in 1999. During that time, he has focused his practice on standing up for the rights of the everyday citizen through his advocacy in Civil Rights, Veteran's Disability, Social Security Disability, and Employment Discrimination. Mr. Shore and our firm have

represented over 40,000 clients in its 23 years of operation.

6. Mr. Shore focuses much of his time volunteering and sitting on the boards of multiple charitable organizations. Mr. Shore manages a law firm currently consisting of 14 attorneys.

**Credentials of Scott Johnson, Esq.**

7. Regarding Scott Johnson, Mr. Johnson, Esq. received his Bachelor of Arts Degree in Philosophy in 1991 from the University of Washington, and received his Juris Doctorate from the University of California, Hastings College of Law in 1996. Mr. Johnson has been a member in good standing of the Pennsylvania bar since 2000. He is also currently admitted to the California bar (1997).

8. Mr. Johnson has been a practicing attorney since 1997. Mr. Johnson has focused his practice on Civil Rights and Employment Discrimination.

**Credentials of Brian Doyle, Esq.**

9. Regarding Brian Doyle, Mr. Doyle, Esq. received his Bachelor of Arts and History Degree in 2005 from Boston College, and received his Juris Doctorate from the American University, Washington College of Law in 2011. Mr. Doyle has been a member in good standing of the New Jersey bar since 2011 and the Pennsylvania bar since 2014. He is also currently admitted to the New York bar (2012)

10. Mr. Doyle has been a practicing attorney since 2012.

During that time, he operated his own law firm from 2012 to 2015 focusing on constitutional tort claim. Mr. Doyle went on to further his career practicing in both civil and criminal cases.

11. From 2016 to his involvement in this matter, Mr. Doyle practiced extensively in employment, civil rights and disability cases.

**Credentials of the undersigned, Kathleen Redpath-Perez**

12. Regarding my own credentials, I am an attorney licensed in good standing in the State of New Jersey, having been admitted in January 2010 after taking the bar examination in July of 2009 and graduating from Drexel Law in May of 2009. I am also admitted to the District of New Jersey in the fall of 2021 and I am in good standing in that jurisdiction.

13. Concerning my field of practice, I focus my practice on sophisticated litigation, including employment and civil rights matters.

14. By way of relevant background, I started my career as a law clerk (2009-2010) to the Honorable Pedro J. Jimenez, J.S.C. in the Superior Court of New Jersey in the Criminal Division.

15. Thereafter I spent near a decade (9 years) as an Assistant Deputy Public Defender at the Office of the Public Defender where over 70% of my 9 years was spent in the Adult Criminal Trial Region where I represented upwards of 250 individuals charged with felony-level crimes in a high crime area

(Trenton, NJ) with the remainder of the time dedicated to represented parents in contested child welfare matters in Family Court at the start of my career.

16. During my time as an Assistant Deputy Public Defender, I engaged in complex motion practice concerning constitutional issues and prepared and tried may felony-level matters before a jury to verdict, and also tried many bench trials for contested child welfare matters in Family Court. As such, I have extensive trial experience and command of the rules of evidence.

17. In this case~~7~~, I worked tirelessly to learn the case, prepare Plaintiff to testify, simplify and organize the evidence, and ensure that the jury understood the intricacies of the case while preventing inadmissible evidence from being presented to the jury. While I have never in my entire career had so little time to prepare a case for trial, the end result was that the client prevailed in his action. As of the date I agreed to handle this matter and ongoing, my regular billing rate is \$500.00 an hour. This is within the typical range of prevailing market rates charged by attorneys with similar experience performing similar work in the geographic region and in this area of law (See also Exhibit D, Certification of Richard Swartz, a local experienced employment attorney who has reviewed our hourly rates).

18. I have also attached a certification of my current client who confirmed my regular billing rate as being \$500.00 an hour as

well as a former colleague of mine who worked with me in the Office of the Public Defender (See Exhibit E).

19. In fulfilling my duties as trial counsel in this matter, I performed document review, research, writing, trial preparation including preparing my client to testify and preparing cross-examination of other witnesses, and trial.

20. While expressly reserving the attorney-client and attorney work product privileges, the tasks I performed related to litigating Plaintiff's discrimination, harassment and retaliation claims are reflected in the time records attached to Plaintiff's motion as Exhibit "A."

21. Plaintiff's requested costs are itemized and attached as Exhibit "B."

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 5, 2022, in Lawrenceville, New Jersey.

Law Office of Eric A. Shore

/s/ Kathleen Redpath-Perez, Esquire  
Kathleen Redpath-Perez, Esquire  
Attorney for Plaintiff